This Track 1 Decision Document is marked "Draft" but is a final document signed by the agencies.

2/15/2005



1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthome, Governor Toni Hardesty, Director

November 8, 2004

Ms. Kathleen Hain, CERCLA Lead Environmental Restoration Program U.S. Department of Energy Idaho Operations Office 1955 Fremont Avenue Idaho Falls, Idaho 83401-1216

Re: Correction of previously signed Decision Statements for Track 1s

Dear Ms. Hain:

During a October 27, 2004 conference call, DOE identified several Track 1 decision statements that were signed by both EPA and DEQ over the last several months that differ in the nomenclature used to define the recommended status of the sites. Specifically, EPA recommended *No Action* at several sites while DEQ recommended *No Further Action* for these same sites. After further review of these documents, we have concluded that some of our previous recommendations were in error. This letter serves as official notice correcting these recommendations.

To clarify, DEQ recommends *No Action* for sites with no contamination source present, or for sites with a contamination source that currently poses an acceptable risk for unrestricted use. A *No Further Action* recommendation is made for sites with a contamination source or potential source present, but for which an exposure route is not available under current conditions. Although no additional remedial action is required at this time, current institutional controls (such as fencing and administrative controls that prevent or limit excavation/drilling into contaminated areas) must be maintained. After a remedial decision is made for these sites, they should be included in a CERCLA review performed at least every five years to ensure that site conditions used to evaluate the site have not changed and to evaluate the effectiveness of the *No Further Action* Decision. If site conditions or current institutional controls change, additional sampling, monitoring, or action will be considered.

On the basis of the above definitions, DEQ now recommends *No Action* under the FFA/CO for the following sites: Site-10, -17, -18, 21, -27, -28, -31, -32, -34, -37, -38, -40, -41, -42, -43, -44, and -47. However, note that Sites -18 and -38 are wells that must be secured and eventually closed and abandoned in accordance with Idaho Department of Water Resources regulations.

Ms. Kathleen Hain, Lead, CERCLA Program November 8, 2004 Page Two

DEQ continues to recommend *No Further Action* for Site-39. Although no live munitions have been identified at the site, the possibility exists for live munitions to be present mixed with the inert munitions that have been identified. Therefore, the site may pose an unacceptable risk to human health and the environment, if it were currently released for unrestricted use.

Please contact Margie English of my staff at (208) 373-0306 if you have questions about this letter.

Sincerely

Daryl F. Koch FFA/CO Manager

DK/jc

CC:

Nicholas Ceto, U.S. EPA Region 10, Richland, WA Dennis Faulk, U.S. EPA Region 10, Richland, WA Kathy Ivy, U.S. EPA Region 10, Seattle, WA Mark Shaw, DOE, Idaho Falls Margie English, DEQ, Boise, ID SITE 044 TRACK 1 DECISION DOCUMENTATION PACKAGE, OU 10-08

DECISION DOCUMENTATION PACKAGE COVER SHEET

Prepared in accordance with

TRACK 1 SITES: GUIDANCE FOR ASSESSING LOW PROBABILITY HAZARD SITES AT THE INEEL

Site Description:

Concrete-Lined Depression West of the Central Facilities Area (CFA)

Site ID:

044

Operable Unit:

10-08

Waste Area Group:

10

I. Summary – Physical Description of the Site:

Site 044 is a concrete-lined pit located about 100 yds east of the Central Facilities Area (CFA) Landfill and north of West Portland Road. This site was originally listed as part of an environmental baseline assessment in 1994 and identified as a potential new waste site in 1995. In accordance with Management Control Procedure-3448, "Reporting or Disturbance of Suspected Inactive Waste Sites," a new site identification form was completed for this site. As part of the process, a field team wrote a site description, and collected photographs and global positioning system (GPS) coordinates of the site (the GPS coordinates are

The GPS coordinate system is listed as North American Datum 27, Idaho East Zone, State Plane Coordinates. The new site identification process also included a search and review of existing historical documentation.

INEEL WAG 10 and Cultural Resources personnel investigated Site 044 on June 6, 2001. They determined that the site is an old concrete-lined depression approximately 50 ft wide by 50 ft long by 8 ft deep. The original use of the concrete structure is unknown. A nearby dirt pile appears of a consistent size with the concrete depression. The date "1943" is scrawled in the concrete in two places, indicating that construction was during the time that the U.S. Navy was onsite for testing gun barrels. The depression contains weathered wood, metal bands, empty rusted cans, wire, office trash (i.e., metal pen nibs), and other miscellaneous debris. The weathered condition of the debris indicates that it was abandoned in place several decades ago. There are no lines in or out of the depression, no pumps, or other indicators that it was used as a liquid retention pond. The concrete shows no evidence of staining, charring, or spalling due to heat; therefore, it is also unlikely that the structure was used as a fire-training pit. The concrete pit has partially filled with soil in which grasses are growing.

There is no visual evidence of hazardous constituents and no evidence that waste has recently been disposed of at this site. There is no evidence of stained or discolored soil or disturbed vegetation surrounding the concrete depression. The ground surface reflects well-established native grasses and sagebrush. The description of the site conditions is based on recent site investigations and historical research. No field screening or sample data exist for this site.

DECISION RECOMMENDATION

II. SUMMARY – Qualitative Assessment of Risk:

There is no evidence that a source of contamination exists at this site and no empirical, circumstantial or other evidence of contaminant migration. The reliability of information provided in this report is high. Field investigations, interviews with INEEL Cultural Resource and Facility Operations personnel, and photographs revealed no visual evidence of hazardous substances that may present a danger to human health or the environment. Therefore, the overall qualitative risk at Site 044 is considered low.

III. SUMMARY – Consequences of Error:

False Negative Error:

The possibility that contaminant levels exceed risk-based limits is remote. Field investigations and visual observations of the debris and surrounding surface soil indicated no evidence of hazardous constituents. If hazardous materials and wastes were placed into this area, evidence such as stained soil, odors, loss of vegetation, fibrous materials, or other indications of contamination would be present.

False Positive Error:

If further action were completed at this low risk site, funds could exceed the environmental benefit. Surface soil sampling and analysis for organic compounds, metals, radionuclides or other hazardous constituents would be needed to confirm the presence or absence of contamination. Based on existing information, there is no need for further action at this site.

IV. SUMMARY – Other Decision Drivers:

There are no other decision drivers for this site.

Recommended Action:

It is recommended that this newly identified site be classified as No Further Action. Field investigations, interviews, historical knowledge of this area, and photographs indicate it is highly unlikely that hazardous or radioactive materials were generated or disposed of at this site. It is located in a remote area with no viable pathways or receptors. The site is located in the southwestern section of the INEEL; approximately 100 yards east of the CFA Landfill and north of West Portland Road. There is nothing present at this site to indicate the occurrence of contaminant migration, or historical or threatened release of hazardous substances, pollutants or contaminants. Although the source and intended use of the concrete depression are unknown, it has been determined that there are no lines in or out of the pond, no pumps, and no evidence of staining, charring, or spalling, which indicates that the pit was not likely used for liquid retention or fire training. Neither the concrete depression nor the scattered debris poses an unacceptable risk to human health or the environment.

Signatures: war look slee	# Pages: 16 Date: 08/27/01	
Prepared By: Marilyn Paarmann, WPI	DOE WAG Manager:	
Approved By: Min Took 9-30-04	Independent Review: 17 Aug 9-70	-04

DECISION	STATEMENT
(DOI	E RPM)

Date Received: //14/05

Disposition:

5, to 044 at CFA is classified as no action.

This determination will be recorded in the site debbase and listed in the 2005 INEEL Integrated 5-Year Review.

Date: 1/14/05 # Pages:

Name: Kathleen Hain Signature: Nathleen E Hain

DECISION STATEMENT
(EPA RPM)

5, te -044

Date Received:

Disposition:

EPA concurs that this site Should be classified as no

action.

Date: 9-23-0

Name:

Dennis Fai

Pages:

Signature:

Name:

DRAFT	URAFI
DECISION STATEMENT (IDEQ RPM)	
Date Received:	
Disposition:	
Site 044	
Site 044 is a concrete lined pit located about 100 yards east of the CFA Landfill, west of Lincoln Boulevard, and north of West Portland Road. The pit is about 50 feet wide by 5 feet long and 8 feet deep. The original use of the structure is unknown but the date "1943" is scrawled in the concrete in 2 locations; this date places the construction within the time frame the U.S. Navy was on site. There are no lines in or out of the pit, no pumps, or other indications the pit was used for holding liquids. "The concrete shows no evidence of staining, charring, or spalling so it is unlikely the pit was used for fire training. There is no visual evidence of hazardous constituents or that waste has recently been disposed in the pit. There is some debris in the pit but it is weathered and assumed to have been in the pit for decades. The debris consists of "weathered wood, metal bands, empty rusted cans, wire, office trash (i.e., metal pen nibs), and other miscellaneous debris." The State recommends No Further Action for this site.	0
Date: August /) 2004 #Pages:	

Signature:

PROCESS/WASTE WORKSHEET	ORKSHEET	
SITE ID: 044	PROCESS:	Concrete-Lined Depression West of CFA
	WASTE:	Concrete-Lined Depression/Industrial Debris
Col 1 Processes Associated with this Site	Col 2 Waste Description & Handling Procedures	Col 3 Description & Location of any Artifacts/Structures/Disposal Areas Associated with this Waste or Process
Concrete-lined depression and miscellaneous debris within the depression, likely related to Naval activities.	The site is a large concrete-lined depression, containing miscellaneous debris. The origin and purpose of the depression are unknown, but it was related to Navy activities in the 1940s.	Artifact: Industrial Debris Location: The site is located about 100 yds east of the CFA Landfill, north of West Portland Road. Description: Concrete-lined depression about 50 ft wide by 50 ft long by 8 ft deep, adjacent to a large dirt pile. Weathered wood, metal bands, empty rusted cans, wire, office trash and other rusted metal pieces were found in the depression.

CONTAMINANT WORKSHEET					
SITE ID: 044	PROCESS:	Concrete-Lined Depression West of CFA	ssion West of CFA		
	WASTE:	Concrete-Lined Depression/Industrial Debris	ssion/Industrial Debri	S	
Col 4 What Known/Potential Hazardous Substance/Constituents are Associated with this Waste or Process?	Col 5 Potential Sources Associated with this Hazardous Material	Col 6 Known/Estimated Concentration of Hazardous Substances/ Constituents	Col 7 Risk-based Concentration	Col 8 Qualitative Risk Assessment (high/med/	Col 9 Overall Reliability (high/med/ low)
None	Soil	None	Not Applicable	Pow	High

Question 1.	What are the waste generation processes, locations, and dates of operation associated with this site?
Block 1	Answer:
cans, wire, of consistent in statement is no ev was used for the concrete. place several	concrete-lined depression containing weathered wood, metal bands, empty rusted fice trash and other scrap metal pieces. A large dirt pile located adjacent to the site is size with the depression. The past use of the concrete structure is unknown: however, idence of lines coming in or out, pumps, staining, or spalling, so it is unlikely that it liquid retention or fire training. The date "1943" and sets of initials were marked into The nature and weathered condition of the debris indicate that it was abandoned in decades ago. The site is located in the southwestern section of the INEEL of 100 yards east of the CFA Landfill and north of West Portland Road.
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)
revealed that and office det	h Environmental Restoration Environmental Safety and Health (ER ES&H) personnel the site consists of a concrete-lined depression containing miscellaneous industrial prise. It is unlikely that either the depression or debris poses an unacceptable risk to or the environment.
Block 3	Has this INFORMATION been confirmed? Yes No If so, describe the confirmation. (check one)
Interviews and site investigations were conducted with ER ES&H personnel and WAG 10 and Cultural Resource personnel. Photographs confirm the type of debris and present condition of the site.	
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)
	2, 5, 6 Documentation about Data Disposal Data Disposal Data Disposal Data Disposal Data DA Data DA Data DA Data DA Data DA DA Data DA D

Question 2.	What are the disposal processes, locations, and dates of operation associated with this site? How was the waste disposed?
Block 1	Answer:
the concrete- large dirt pile concrete structis likely relate	of site investigation by INEEL WAG 10 and Cultural Resource personnel revealed that lined depression contains old, weathered industrial and office debris. There is also a located adjacent to the depression that is equivalent in size. The past use of the cture is unknown. It has been determined that the debris is more than 50 years old and d to Naval activities. The site is located in the southwestern section of the INEEL; y 100 yards east of the CFA Landfill and north of West Portland Road.
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)
depression co	th INEEL personnel revealed that this site includes an abandoned concrete-lined ontaining miscellaneous industrial debris and a dirt pile consistent in size with the lothing at the site is likely to pose an unacceptable risk to human health or the
Block 3	Has this INFORMATION been confirmed? Yes No (check one)
This informati of the area.	on was confirmed with Interviews, investigations, photographs, and historical research
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)
	2, 5,6 Documentation about Data Disposal Data Disposal Data DA Data S Safety Analysis Report DEBUTE Drawings D

Question 3.	Is there evidence that a source exists at this site? If so, list the sources and describe the evidence.
Block 1	Answer:
personnel inventage industrial in na purpose of the pumps. It is un	vidence that a source exists at Site 044. INEEL WAG 10 and Cultural Resource estigated the site on June 6, 2001. The investigation revealed no evidence of instituents, stained or discolored soil, or odors. The debris was identified as being old, ature, and likely resulted from Navy personnel living at CFA during World War II. The epit is unknown. There is no evidence of staining, charring, spalling, lines in or out, or notikely the structure was used for liquid retention or fire training. There is no evidence of stable risk to human health or the environment.
4	
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)
and office deb	d site investigations revealed that the concrete-lined depression contains construction or is, and likely poses no risk to human health or the environment. Photographs show ndition of the depression and debris.
Block 3 Has this INFORMATION been confirmed? Yes No If so, describe the confirmation. (check one)	
Interviews, site investigations, photographs, and historical research confirm the information.	
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)
	2, 5,6 Documentation about Data Disposal Data CA Data

Question 4.	Is there empirical, circumstantial, or other evidence of migration? If so, what is it?	
Block 1	Answer:	
hazardous con appears to be site consists of 2001 site inve that the debris	There is no evidence of migration at Site 044. Site investigations revealed no visual evidence of hazardous constituents, disturbed, stained or discolored soil areas, or odors. The vegetation appears to be well established around the concrete depression. It has been determined that the site consists of a concrete-lined structure containing miscellaneous industrial debris. A June 6, 2001 site investigation conducted by INEEL WAG 10 and Cultural Resource personnel determined that the debris is more than 50 years old and is likely related to Naval operations that took place during World War II at what is now the INEEL.	
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)	
depression, d	Site inspections and photographs of the area show that the artifacts consist of a concrete-lined depression, dirt pile and miscellaneous industrial debris in the depression. Photographs revealed the types of debris and present condition of the site.	
Block 3	Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one)	
This information was confirmed through site inspections, interviews, photographs and historical research.		
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)	

Question 5.	Does site operating or disposal historical information allow estimation of the pattern of potential contamination? If the pattern is expected to be a scattering of hot spots, what is the expected minimum size of a significant hot spot?
Block 1	Answer:
substances a evidence of d activities more (organics, me sampling; how and weathere	expected pattern of potential contamination because there is no evidence of hazardous at the site. There is no evidence stained or discolored soil in the area, odors, or visual isturbed vegetation. The debris is industrial in nature and likely related to Naval e than 50 years ago at what is now the INEEL. The pattern of hazardous constituents stals, radionuclides, etc.) cannot be estimated without further field screening or soil wever, because of the appearance and condition of the concrete structure, and the age ad condition of the debris, it is highly unlikely that contaminants would be present at risk-based limits.
Block 2	How reliable are the information sources? ☑ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)
site investigat revealed that 50 years old.	on was obtained from a 1994 environmental baseline assessment and a subsequent tion conducted by INEEL WAG 10 and Cultural Resource personnel. The investigation the debris is industrial in nature, is related to former INEEL operations and more than Photographs indicate that the soil is not stained or discolored and vegetation he depression is well established.
Block 3	Has this INFORMATION been confirmed? ☐ Yes ☐ No If so, describe the confirmation. (check one)
This information was confirmed through site inspections, photographs, interviews and historical research.	
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)
	2, 5,6 Documentation about Data

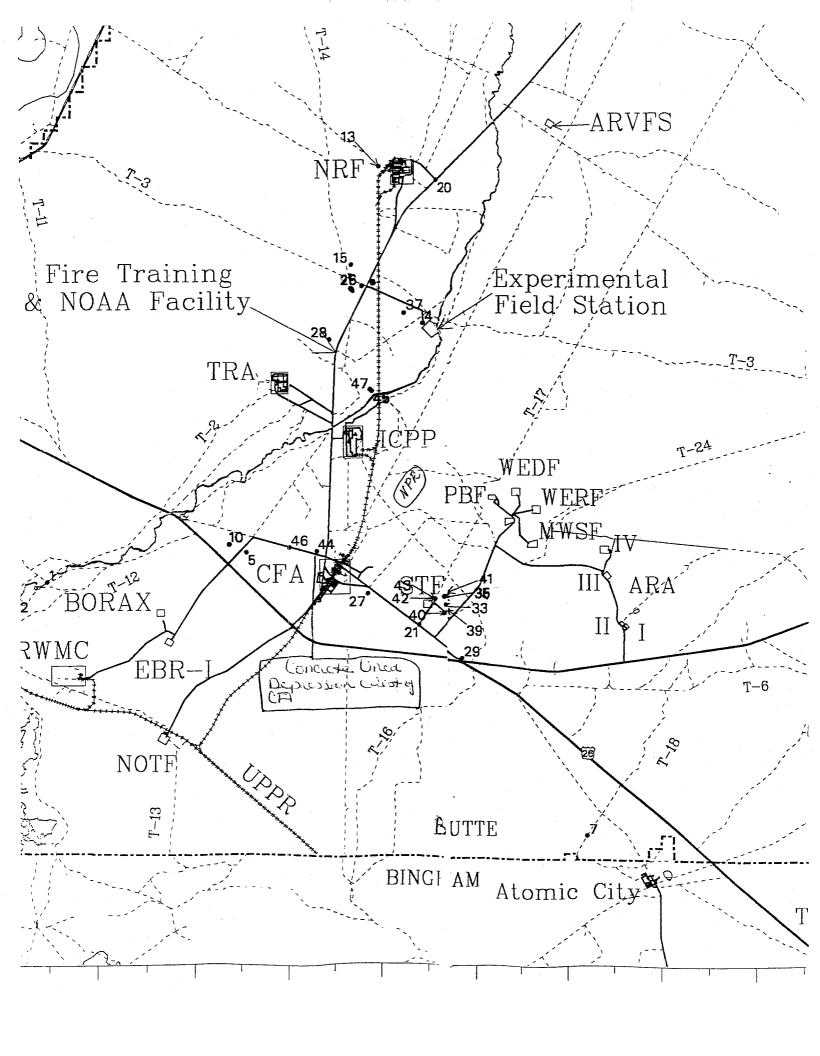
Question 6.	Estimate the length, width, and depth of the contaminated region. What is the known or estimated volume of the source? If this is an estimated volume, explain carefully how the estimate was derived.
Block 1	Answer:
by 8 ft deep of wire, office trains consistent in on the concrestructure indicates of a source at	tions and photographs indicate that Site 044 consists of a large 50 ft wide by 50 ft long concrete-lined structure, containing weathered wood, metal bands, empty rusted cans, ash (metal pen nibs) and other rusted metal pieces. The large dirt pile located nearby in size with the concrete depression. The date "1943" and a set of initials are scrawled ste, therefore dating the site. The weathered condition of the debris found within the cates that it was likely abandoned in place several decades ago. There is no evidence this site or contaminated region to estimate because there is no evidence of radioactive materials.
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)
subsequent s vegetation is	ion was obtained from an environmental baseline assessment conducted in 1994, a ite investigation, and interviews. Photographs taken during the investigation show that well established around the depression and that there is no evidence of stained or it in or around the depression, dirt pile or debris.
Block 3	Has this INFORMATION been confirmed? Yes No If so, describe the confirmation. (check one)
Interviews, sit	te investigations, photographs and historical research confirm this information.
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)
	2, 5,6 Documentation about Data Disposal Data Disposal Data DA Data DA Data DA Data DA Data DA DA DATA DA DA DATA DA DA DATA DA D

Question 7.	What is the known or estimated quantity of hazardous substance/constituent at this source? If the quantity is an estimate, explain carefully how the estimate was derived.		
Block 1	Answer:		
The estimated quantity of hazardous substances/constituents at this site is near zero, because there is no evidence of hazardous or radioactive materials present at Site 044. The site includes a concrete-lined depression containing miscellaneous industrial debris likely abandoned in place more than 50 years ago (1943 timeframe). There is no evidence of staining, spalling, or lines in or out of the depression or pumps, so it is unlikely the structure was used for liquid retention.			
Block 2 How reliable are the information sources? High Med Low Explain the reasoning behind this evaluation. (check one)			
This information was obtained from an environmental baseline assessment, subsequent site investigation, interviews, and photographs of the area. The site investigation revealed no evidence of contamination either in or around the pit, dirt pile or debris.			
Block 3 Has this INFORMATION been confirmed? Yes No If so, describe the confirmation. (check one)			
This information was confirmed through site inspections, interviews, photographs and historical research.			
Block 4 Sources of Information (check appropriate box(es) & source number from reference list)			
	2, 5,6 Documentation about Data		

Question 8.	Is there evidence that this hazardous substance/constituent is present at the source as it exists today? If so, describe the evidence.			
Block 1	Answer:			
There is no evidence that a hazardous substance or constituent is present at levels that require action at this site. The concrete-lined depression, adjacent dirt pile and miscellaneous debris are estimated to be more than 50 years old. There is no evidence of odor, staining or discoloration, or disturbed vegetation surrounding the depression. The past use of the structure is unknown, however, it is not likely that the pit was used for liquid retention.				
·				
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)			
This evaluation is based on interviews, site visitations and photographs of the area. The site shows no soil staining or discoloration. The vegetation surrounding the pit appears to be well established. There is no evidence of hazardous constituents in the depression, dirt pile or debris.				
Block 3 Has this INFORMATION been confirmed? Yes No If so, describe the confirmation. (check one)				
This information was confirmed through site investigations, historical research, interviews and photographs.				
Block 4 Sources of Information (check appropriate box(es) & source number from reference list)				
No Available Information Anecdotal Historical Process Data Current Process Data Photographs Engineering/Site Drawings Unusual Occurrence Report Summary Documents Facility SOPs Other Analytical Data QA Documentation about Data Disposal Data QA Data Description Data New Hotographs Initial Assessment Well Data Construction Data Construction Data				

REFERENCES

- 1. DOE, 1992, Track 1 Sites: Guidance for Assessing Low Probability Sites at the INEL, DOE/ID- 10390 (92), Revision 1, U.S. Department of Energy, Idaho Falls, Idaho, July.
- 2. Interview with an Environmental Baseline Assessment team member, February 6-7, 2001.
- 3. Photographs of Site 044: PN99-0424-1-1, -2.
- 4. FY 1999 WAG 10 Newly Identified Sites, Volumes I and II.
- 5. Interviews with Brenda Ringe Pace, INEEL Cultural Resources Management, February 7 and May 16, 2001.
- 6. Site investigation conducted by Tom Haney, INEEL Wage 10 and Brenda Ringe, INEEL Cultural Resources Management, June 6, 2001.

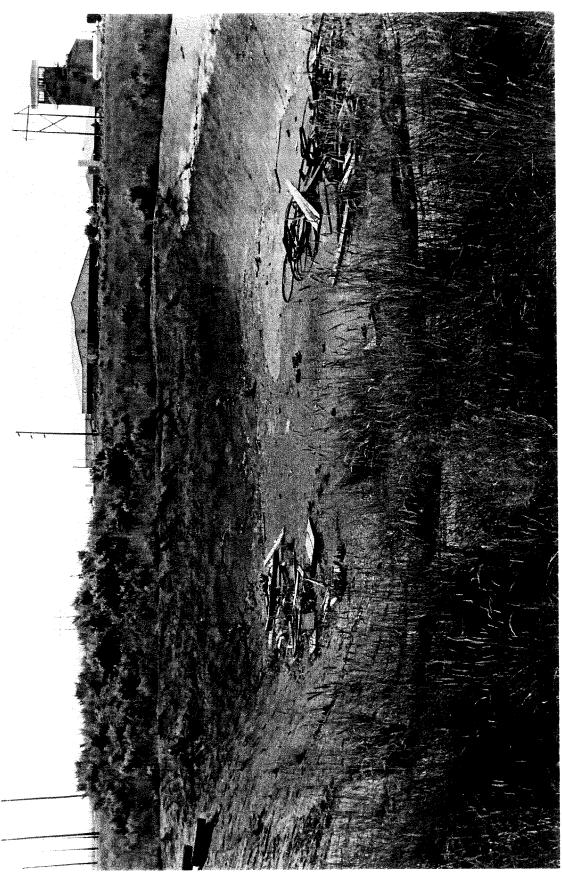


Attachment A

Photographs of Site #044



Site: 044 Concrete Lined Depression west of CFA (PN99-0424-1-1)



Site: 044 Concrete Lined Depression west of CFA (PN99-0424-1-2)

Attachment B

Supporting Information for Site #044

435.36 04/14/99 Rev. 03

NEW SITE IDENTIFICATION

Par	A - To Be Completed By Observer		
1.	Person Initiating Report: Jacob Harris	Phone: 526-1877	
	Contractor WAG Manager: Douglas Burns	Phone: 526-4324	
2.	Site Title: 044, Concrete Lined Depression West of CFA		
3.	Describe the conditions that indicate a possible inactive or unreported waste site. Include location and description of suspicious condition, amount or extent of condition and date observed. A location map and/or diagram identifying the site against controlled survey points or global positioning system descriptors shall be included to help with the site visit. Include any known common names or location descriptors for the waste site.		
· · · · · · · · · · · · · · · · · · ·	A concrete depression is located about 100 yards east of the CFA Land site visit observations included, a concrete lined depression about 50's metal was found in the pit. Rusty cans and other rusty metal was found. The reference number for this site is 044	by 50' by 6' deep adjacent to a large dirt pile. Wood and str	
Par	t B – To Be Completed By Contractor WAG Manager		
4.	Recommendation:		
	This site meets the requirements for an inactive waste site, require FFA/CO Action Plan. Proposed Operable Unit assignment is recowned WAG:	es investigation, and should be included in the INEEL mmended to be included in the FFA/CO. perable Unit:	
	This site DOES NOT meet the requirements for an inactive waste included in the INEEL FFA/CO Action Plan.	site, DOES NOT require investigation and SHOULD NOT b	
5.	Basis for the recommendation:		
	The conditions that exist at this site indicate the potential for an inactive or Disturbance of Suspected Inactive Waste Sites.	e waste site according to Section 2 of MCP-3448 Reporting	
	The basis for recommendation must include: (1) source description; (2 concern; and (4) descriptions of interfaces with other programs, as app	2) exposure pathways; (3) potential contaminants of licable (e.g., D&D, Facility Operations, etc.)	
6.	Contractor WAG Manager Certification: I have examined the proposed believe the information to be true, accurate, and complete. My recommendation to be true, accurate, and complete.	d site and the information submitted in this document and nendation is indicated in Section 4 above.	
Nan	ne: Signature:	Date:	